

JACOBY & MEYERS, LLP
50 PARK PLACE, SUITE 1101
NEWARK, NEW JERSEY 07102
(973) 643-2707

Attorney ID No.: 008181985

Attorneys for Plaintiff(s)

Our File No. 121695-02/amd

-----X
SALIM AHMED,

Plaintiff,

-vs-

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX
COUNTY

DOCKET NO.: MID-L-007088-20

CIVIL ACTION
SUMMONS

FEDEX GROUND PACKAGE SYSTEM, INC.,
DMITRIY ISKHAKOV, JOHN DOES 1-10
(names for fictitious individuals) and ABC
COMPANIES 1-10 (names for fictitious entities),

Defendants .
-----X

FROM THE STATE OF NEW JERSEY
TO THE DEFENDANT NAMED ABOVE

DMITRIY ISKHAKOV

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney, must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/pro_se/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee of \$175.00 payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the Court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

MICHELLE M. SMITH, ESQ.

Clerk of Superior Court

October 12, 2020

DMITRIY ISKHAKOV

Defendant

315 Lee Miller Court, Apt. 3E

Suwanee, GA 30024

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 645-4300
COURT HOURS 8:30 AM - 4:30 PM

DATE: OCTOBER 09, 2020
RE: AHMED SALIM VS FEDEX GROUND PACKAGE SYSTEM,
DOCKET: MID L -007088 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON THOMAS D. MCCLOSKEY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 004
AT: (732) 645-4300 EXT 88905.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: RAYE D. FUTERFAS
JACOBY & MEYERS
50 PARK PLACE
SUITE 1101
NEWARK NJ 07102

ECOURTS

File #121695-02/amd

JACOBY & MEYERS, LLP
50 PARK PLACE SUITE 1101
NEWARK, NEW JERSEY 07102
ATTORNEY ID NO.: 008181985
(973) 643-2707
ATTORNEY FOR PLAINTIFF

-----x
SALIM AHMED,

Plaintiff,

-against-

FEDEX GROUND PACKAGE SYSTEM, INC.,
DMITRIY ISKHAKOV, JOHN DOES 1-10
(names for fictitious individuals)
and ABC COMPANIES 1-10 (names for
fictitious entities),

Defendants.
-----x

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX
COUNTY

Docket No.
CIVIL ACTION COMPLAINT
AND JURY DEMAND
CERTIFICATION PURSUANT TO
R.4:5-1 and DESIGNATION OF
TRIAL COUNSEL

Plaintiff, SALIM AHMED, residing at 1601 Mindy Lane, Piscataway,
New Jersey, complaining of the defendants herein, states:

FIRST COUNT

1. That at all times hereinafter mentioned, the plaintiff was
and still is a resident of the County of Middlesex, State of New
Jersey.

2. That at all times hereinafter mentioned, upon information and
belief, the defendant, DMITRIY ISKHAKOV, at the time of the incident
was a resident of the County of Gwinnett, State of Georgia and is

currently a resident of the County of Queens, State of New York.

3. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was and still is a domestic corporation organized and existing under and by virtue of the laws of the State of New Jersey.

4. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was and still is a foreign corporation duly incorporated within the State of Delaware.

5. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was and still is a foreign corporation authorized to do business within the State of New Jersey.

6. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was and still is a business entity doing business within the State of New Jersey.

7. That at all times hereinafter mentioned, upon information and belief, the defendants, JOHN DOES 1-10, were and are as yet unidentified individuals.

8. That at all times hereinafter mentioned, upon information and belief, the defendants, ABC COMPANIES 1-10, were and still are business entities whose identities are yet unknown.

9. That at all times hereinafter mentioned, upon information and belief, the defendants, JOHN DOES 1-10, were the titled owners, registered owners, lessors, lessees and/or operators of a certain motor vehicle and/or trailer.

10. That at all times hereinafter mentioned, upon information and belief, the defendants, ABC COMPANIES 1-10, were the titled owners, registered owners, lessors, and/or lessees of a certain motor vehicle and/or trailer.

11. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the titled owner of a 2017 Kenworth motor vehicle, bearing a certain license plate number, for the State of Indiana.

12. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the registered owner of a 2017 Kenworth motor vehicle, bearing a certain license plate number, for the State of Indiana.

13. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the lessee of a 2017 Kenworth motor vehicle, bearing a certain license plate number, for the State of Indiana.

14. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the

titled owner of certain trailers, bearing certain License Plate numbers for the State of Indiana.

15. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the registered owner of certain trailers, bearing certain License Plate numbers for the State of Indiana.

16. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the lessor of certain trailers, bearing certain License Plate numbers for the State of Indiana.

17. That at all times hereinafter mentioned, upon information and belief, the defendant, FEDEX GROUND PACKAGE SYSTEM, INC., was the lessee of certain trailers, bearing certain License Plate numbers for the State of Indiana.

18. That at all times hereinafter mentioned, upon information and belief, the aforesaid Kenworth motor vehicle bearing a certain License Plate number for the State of Indiana and the aforesaid trailers were operating together in tandem.

19. That at all times hereinafter mentioned, upon information and belief, the defendant, DMITRIY ISKHA KOV, was the operator of the aforesaid motor vehicle, bearing a certain license plate number, for the State of Indiana.

20. That at all times hereinafter mentioned, upon information and

belief, the defendant, DMITRIY ISKHAKOV, operated the aforesaid motor vehicle with the express and/or implied permission, consent and knowledge of the defendant owner, FEDEX GROUND PACKAGE SYSTEM, INC.

21. That at all times hereinafter mentioned, upon information and belief, the defendant, DMITRIY ISKHAKOV, was an agent, servant, and/or employee of defendant, FEDEX GROUND PACKAGE SYSTEM, INC.

22. That at all times hereinafter mentioned, upon information and belief, the defendant, DMITRIY ISKHAKOV, operated the aforesaid motor vehicle with the express and/or implied permission, consent, and knowledge of the defendant owner, FEDEX GROUND PACKAGE SYSTEM, INC., while within the scope of his employment.

23. That at all times hereinafter mentioned, the plaintiff, SALIM AHMED, was the owner and operator of a 2016 Honda motor vehicle, bearing a certain license plate number, for the State of New Jersey.

24. That at all times hereinafter mentioned, Interstate 287 Southbound, located in Edison Township, County of Middlesex, State of New Jersey, was and still is a public highway and thoroughfare and was the situs of the incident herein.

25. That on or about the 9th day of November, 2019, the aforementioned motor vehicles were in contact with each other.

26. The collision and resulting injuries were caused by the negligent, wanton, reckless and careless acts of the defendants herein.

27. That on or about the 9th day of November, 2019, the defendants, FEDEX GROUND PACKAGE SYSTEM, INC., DMITRIY ISKHAKOV, JOHN DOES 1-10 and ABC COMPANIES 1-10, operated their motor vehicles or allowed, caused and/or permitted their motor vehicles to be operated in such a negligent, wanton, reckless and careless manner so as to cause the aforementioned motor vehicles of the defendants, FEDEX GROUND PACKAGE SYSTEM, INC. and DMITRIY ISKHAKOV, to come into contact with the plaintiff's motor vehicle; in failing to properly keep, control and maintain the motor vehicle so as to prevent the incident herein; in failing to keep the motor vehicle under proper control; in failing to operate the motor vehicle in a manner and at a speed that was reasonable and proper under the prevailing traffic conditions; in failing to properly operate the braking and acceleration devices of the motor vehicle under the circumstances of the roadway where the incident occurred; in failing to keep a proper lookout; in failing to stop and/or slow down; in acting with reckless disregard for the safety of others; in failing to keep alert and attentive; in failing to properly apply brakes; in failing to sound horn; in failing to yield the right-of-way to oncoming traffic; in failing to keep in the proper lane of traffic; in changing lanes unsafely; and the defendant(s), FEDEX GROUND PACKAGE SYSTEM, INC., was further negligent in that the defendant carrier was negligent in the hiring, retention and supervision of its driver; in failing to

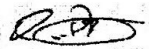
comply with applicable federal motor carrier safety administration regulations as adopted by the State of New Jersey; improperly hiring and continued employment of inept, incompetent and/or unskilled employees, and the defendants were in other ways negligent, wanton, reckless, and careless.

28. As a direct and proximate cause of the aforesaid negligence of the defendants, the plaintiff, SALIM AHMED, was injured, has incurred and in the future will incur medical expenses and/or liens for the treatment of his injuries, has been disabled and in the future will be disabled and not able to perform his usual functions, has been caused great pain and suffering, to his great loss and damage.

29. This suit is not barred by the provisions of N.J.S.A. 39:6A-1, et. seq.

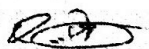
WHEREFORE, plaintiff, SALIM AHMED, demands judgment against the defendants, FEDEX GROUND PACKAGE SYSTEM, INC., DMITRIY ISKHAKOV, JOHN DOES 1-10 and ABC COMPANIES 1-10, for damages sufficient to compensate for the injuries sustained, medical expenses and/or liens incurred, together with interest, attorneys fees and costs of suit.

JACOBY & MEYERS, LLP
Attorneys for Plaintiff

BY: 
RAYE D. FUTERFAS, ESQ.

JURY DEMAND

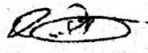
Plaintiff demands trial by jury.

BY: 
RAYE D. FUTERFAS, ESQ.

STATEMENT PURSUANT TO R. 4:5-1

I certify that the matter in controversy is to the best of my knowledge, information and belief not the subject of any other action pending in any Court or of a pending arbitration proceeding, and that no such action or arbitration proceeding is contemplated. The plaintiff is at this time unaware of any additional necessary parties to this action.

Dated: 10/6/2020



RAYE D. FUTERFAS, ESQ.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R.4:25-4, Cynthia Maurer, Esq., of Jacoby & Meyers, LLP is hereby designated as trial counsel in the above matter.

JACOBY & MEYERS, LLP
Attorneys for Plaintiff

BY: 

RAYE D. FUTERFAS, ESQ.

DATED: 10/6/2020

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-007088-20

Case Caption: AHMED SALIM VS FEDEX GROUND PACKAGE SYSTEM,

Case Initiation Date: 10/09/2020

Attorney Name: RAYE DAVID FUTERFAS

Firm Name: JACOBY & MEYERS

Address: 50 PARK PLACE SUITE 1101
NEWARK NJ 07102

Phone: 9736432707

Name of Party: PLAINTIFF : AHMED, SALIM

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? YES

Are sexual abuse claims alleged by: SALIM AHMED? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Plaintiff, Salim Ahmed, was caused to sustain severe and serious personal injuries due to the negligence of the defendants.

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/09/2020

Dated

/s/ RAYE DAVID FUTERFAS

Signed